

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA OF
SOUTHERN DIVISION

JO SPAINHOWARD,)
vs.)
Plaintiff,)
vs.)
GREEN TREE FINANCE, LLC,)
Defendant.)
)

CASE NO.: 1:05-cv-517-F

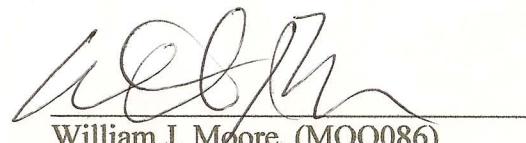
**MOTION FOR EXTENSION OF TIME FOR FILING OF PLAINTIFF'S
BRIEF TO COMPLETE DISCOVERY**

COMES NOW the Plaintiff, by and through undersigned counsel and requests this Honorable Court grant an extension of time for filing of the Plaintiff's brief due to be filed on or before June 17, 2005. As grounds Plaintiff states as follows:

1. The Plaintiff requires certain facts from the Defendant, available through the use of interrogatories in order to substantiate her claim and supplement her argument within her brief;
2. The extension of time is necessary to allow for the preparation, answering, and return of the interrogatories by the Defendant.
3. The Plaintiff has served upon the Defendant interrogatories and is presently awaiting Defendant's answers.
4. The Plaintiff's brief would not be fully complete in argument without the information sought from the Defendant, and lack of the information by the Plaintiff would be prejudicial.

WHEREFORE, THESE PREMISES CONSIDERED, the Plaintiff prays this Honorable Court enter an Order granting an extension of time for filing of the Plaintiff's brief in which to allow for the exchange of discovery by the parties.

Respectfully submitted this the 15th day of June, 2005.



William J. Moore, (MOO086)
Attorney for Plaintiff

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document on the following by placing same in the U.S. Mail postage prepaid and properly addressed this the 15th day of June, 2005.

R. Austin Huffaker, Jr.
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OF COUNSEL